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Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ANASTASSIA KREZOUNB,
aka "Sylvia Kass,"

16 Defendant.
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No. 8:23-CR-00042-CJC

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE:

June 13, 2023

PROPOSED TRIAL DATE:

May 28, 2024

20 Plaintiff United States of America, by and through its counsel
21 of record, the United States Attorney for the Central District of
22 California and Assistant United States Attorney Andrew M. Roach, and
23 defendant Anastassia Krezoub ("defendant"), both individually and by
24 and through her counsel of record, Deputy Federal Public Defender
25 Terra D. Castillo Laughton, hereby stipulate as follows:

26 1. The Indictment in this case was filed on April 18, 2023.
27 Defendant first appeared before a judicial officer of the court in
28 which the charges in this case were pending on April 21, 2023. The

1 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the
2 trial commence on or before June 30, 2023.

3 2. On April 21, 2023, the Court set a trial date of
4 June 13, 2023, and a pretrial conference date for June 5, 2023, at
5 9:00 a.m.

6 3. Defendant is detained pending trial. The parties estimate
7 that the trial in this matter will last approximately four to five
8 days.

9 4. By this stipulation, defendant moves to continue the trial
10 date to May 28, 2024 and the pretrial conference to May 20, 2024, at
11 9:00 a.m. This is the first request for a continuance.

12 5. Defendant requests the continuance based upon the following
13 facts, which the parties believe demonstrate good cause to support
14 the appropriate findings under the Speedy Trial Act:

15 a. Defendant is charged with violations of 18 U.S.C.
16 § 2261A(2) (B), 2261(b) (5) (Stalking) and 18 U.S.C. § 875(d)
17 (Transmitting Interstate Communications with Intent to Extort). The
18 government is producing discovery to the defense, including
19 approximately 7,000 pages of discovery, over a hundred recordings of
20 defendant, and thousands of text messages spanning defendant's
21 communications for over a year.

22 b. In light of the foregoing, counsel for defendant also
23 represents that additional time is necessary to confer with
24 defendant, conduct and complete an independent investigation of the
25 case, conduct and complete additional legal research including for
26 potential pretrial motions, review the discovery and potential
27 evidence in the case, and prepare for trial in the event that a
28 pretrial resolution does not occur. Defense counsel represents that

1 failure to grant the continuance would deny her reasonable time
2 necessary for effective preparation, taking into account the exercise
3 of due diligence.

4 c. Defendant believes that failure to grant the
5 continuance will deny her continuity of counsel and adequate
6 representation.

7 d. The government does not object to the continuance.

8 e. The requested continuance is not based on congestion
9 of the Court's calendar, lack of diligent preparation on the part of
10 the attorney for the government or the defense, or failure on the
11 part of the attorney for the government to obtain available
12 witnesses.

13 6. For purposes of computing the date under the Speedy Trial
14 Act by which defendant's trial must commence, the parties agree that
15 the time period of June 13, 2023 to May 28, 2024, inclusive, should
16 be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i), and
17 (h)(7)(B)(iv) because the delay results from a continuance granted by
18 the Court at defendant's request, without government objection, on
19 the basis of the Court's finding that: (i) the ends of justice served
20 by the continuance outweigh the best interest of the public and
21 defendant in a speedy trial; (ii) failure to grant the continuance
22 would be likely to make a continuation of the proceeding impossible,
23 or result in a miscarriage of justice; and (iii) failure to grant the
24 continuance would unreasonably deny defendant continuity of counsel
25 and would deny defense counsel the reasonable time necessary for
26 effective preparation, taking into account the exercise of due
27 diligence.

1 7. Nothing in this stipulation shall preclude a finding that
2 other provisions of the Speedy Trial Act dictate that additional time
3 periods be excluded from the period within which trial must commence.
4 Moreover, the same provisions and/or other provisions of the Speedy
5 Trial Act may in the future authorize the exclusion of additional
6 time periods from the period within which trial must commence.

7 IT IS SO STIPULATED.

8 Dated: May 11, 2023

Respectfully submitted,

9 E. MARTIN ESTRADA
10 United States Attorney

11 ANNAMARTINE SALICK
12 Assistant United States Attorney
13 Chief, National Security Division

14 /s/ Andrew M. Roach
15 ANDREW M. ROACH
16 Assistant United States Attorney

17 Attorneys for Plaintiff
18 UNITED STATES OF AMERICA

19 Dated: May 11, 2023

20 /s/ with email authorization
21 TERRA D. CASTILLO LAUGHTON
22 Deputy Federal Public Defender

23 Attorney for Defendant
24 ANASTASSIA KREZOUB
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CERTIFICATION OF DEFENSE COUNSEL

I am Anastassia Krezoub's attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of her Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than May 28, 2024, is an informed and voluntary one.

/s/ with email authorization
TERRA D. CASTILLO LAUGHTON
Deputy Federal Public Defender

May 11, 2023
Date

Attorney for Defendant
ANASTASSIA KREZOUN